

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:18-CR-00452-1-FL
NO. 5:18-CR-00452-2-FL

UNITED STATES OF AMERICA

v.

LEONID ISAAKOVICH TEYF and
TATYANA ANATOLYEVNA TEYF

**CONSENT MOTION TO EXTEND
CERTAIN DEADLINES IN
SCHEDULING ORDER**

Defendants, Leonid Isaakovich Teyf and Tatyana Anatolyevna, by and through counsel, hereby move the Court to extend certain deadlines in the Court's Order of September 10, 2019 (DE 334), as set forth below. Counsel for the Government consents to the requested extension. In further support of this motion, Defendants show the following:

1. As the Court is aware, this is a complex case. The Fourth Superseding Indictment alleges fifty (50) Counts on disparate matters and seeks forfeiture of numerous valuable assets and accounts. Not surprisingly, discovery produced to date is voluminous.
2. The parties negotiated the proposed schedule embodied in the 9/10/19 Order backed off of a proposed trial date of February 18, 2020. The Order set the trial date to begin March 16, 2020
3. A number of submissions are due from Defendants on Monday, January 13, including:
 - a. Pre-trial Motions;
 - b. Defense Objections/Consent to US transcripts;

- c. Defense Designation of Audio and Proposed Transcripts for defense designations;
 - d. Reciprocal Discovery by Defendants; and
 - e. Defense Expert Notice and Reports.
- 4. Defendants will be filing their pre-trial motions on or before the deadline on Monday, January 13.
- 5. In light of the complexity of the case and volume of discovery, however, counsel for Defendants need additional time to complete the other deadlines.
- 6. Following discussion, counsel for the Government consents to the following extensions:
 - a. Defense Objections/Consent to US transcripts: 2 weeks, until January 27, 2020;
 - b. Defense Designation of Audio and Proposed Transcripts for defense designations: 2 weeks, until January 27, 2020;
 - c. Reciprocal Discovery by Defendants: to be provided prior to the depositions of foreign witnesses; and
 - d. Defense Expert Notice and Reports: until February 7, 2020.
- 7. Counsel for Defendants have continued working diligently through the voluminous discovery in the case to date. Counsel also continues to evaluate the many issues in the case and defense of same, as part of efforts to provide effective representation to Mr. Teyf on complex issues. The requested additional time will facilitate the effective representation to which these and any defendants are entitled.

8. The requested extension of deadlines will not delay the trial, set for March 16, 2019.

9. This Motion is made in good faith and not for purposes of delay. Neither the Government nor Defendants will be prejudiced by the extensions requested herein.

WHEREFORE, Defendants respectfully requests that the Court extend the deadlines set forth in the Court's Order of September 10, 2019 (DE 344) as requested above. A proposed Order is submitted with this motion.

Respectfully submitted, this the 10th day of January, 2020.

/s/ F. Hill Allen

F. Hill Allen
THARRINGTON SMITH, L.L.P.
P.O. Box 1151
Raleigh, NC 27602
Phone: 919) 821-4711
Fax: 919) 829-1583
hallen@tharringtonsmith.com
N.C. State Bar No. 18884
Counsel for Defendant

Robert S. Wolf
MOSES & SINGER LLP
The Chrysler Building
405 Lexington Ave., 12th Floor
New York, NY 10174-1299
Phone: (212) 554-7825
Fax: (212) 554-7700
rwolf@mosessinger.com
Counsel for Defendant

/s/ Joseph E. Zeszotarski, Jr.

Joseph E. Zeszotarski, Jr.
GAMMON, HOWARD &
ZESZOTARSKI, PLLC
State Bar No. 21310
115 ½ West Morgan Street
Raleigh, NC 27601
(919) 521-5878
Fax: (919) 882-1898
jzeszotarski@ghz-law.com
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January, 2020, I electronically filed the foregoing **CONSENT MOTION TO EXTEND DEADLINES** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Barbara D. Kocher
U.S. Attorney's Office
150 Fayetteville Street, Suite 2100
Raleigh, NC 27601
barb.kocher@usdoj.gov

Jason M. Kellhofer
U.S. Attorney's Office
150 Fayetteville Street, Suite 2100
Raleigh, NC 27601
jason.kellhofer@usdoj.gov

/s/ F. Hill Allen

F. Hill Allen
THARRINGTON SMITH, L.L.P.
P.O. Box 1151
Raleigh, NC 27602
Phone: (919) 821-4711
Fax: (919) 829-1583
hallen@tharringtonsmith.com
N.C. State Bar No. 18884
Counsel for Defendant